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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
ASHOT EGIАЗARYAN,	:	
	:	11 CV 02670 (PKC) (GWG)
Plaintiff,	:	
	:	ECF
-against-	:	
	:	DECLARATION OF
PETER ZALMAYEV,	:	<u>JASON T. COHEN</u>
	:	
Defendant.	:	
-----X	:	

JASON T. COHEN, hereby declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am of counsel to the law firm Flemming Zulack Williamson Zauderer LLP, counsel for Plaintiff Ashot Egiazaryan in the above-captioned action. I submit this declaration in support of Plaintiff's Objections and Motion to Set Aside Magistrate Judge's Order Authorizing Defense Counsel to Access Mr. Egiazaryan's Alleged Asylum Application.

2. Annexed as Exhibit 1 is a true and correct copy of the Transcript of the Discovery Conference held on November 8, 2011.

3. Annexed as Exhibit 2 is a true and correct copy of relevant excerpts from Defendants' Request for the Production of Documents, dated July 18, 2011.

4. Annexed as Exhibit 3 is a true and correct copy of the June 15, 2005 USCIS Interoffice Memorandum from Joseph E. Langlois to Asylum Office Directors.

5. Annexed as Exhibit 4 are true and correct copies of the Proposal by Bloomfield Associates, Inc., dated February 7, 2011 (the "Proposal"), and its attached 13-page legal memorandum prepared by the National Immigration Law Group.

6. Annexed as Exhibit 5 is a true and correct copy of the "Memcon" prepared by Bloomfield Associates, Inc. and sent to Mr. Zalmayev's collaborator, Rinat Akhmetshin, incorporating the Proposal and discussing conference calls with Mr. Zalmayev.

7. Annexed as Exhibit 6 is a true and correct copy of a private investigator's report concerning the homes where Mr. Egiazaryan and his family resides, the vehicles they own and the people who drive them, Bates stamped PZ 001099-001100.

8. Annexed as Exhibit 7 are true and correct copies of surveillance photographs of Mr. Egiazaryan, Bates stamped PZ 001103-001104.

9. Annexed as Exhibit 8 is a true and correct copy of a statement by Andrey Gloriozov, a former trustee in Luxembourg, concerning a bank transfer made 13 years ago, Bates stamped PZ 001084.

10. Annexed as Exhibit 9 is a true and correct copy of a letter addressed to a journalist at the LA Times claiming to possess information about Mr. Egiazaryan's alleged sexual preferences and behavior, Bates stamped PZ 001302.

11. Annexed collectively as Exhibit 10 are true and correct copies of documents originating from Mr. Kerimov's lawyers and PR advisers, Bates stamped PZ 001071-001083.

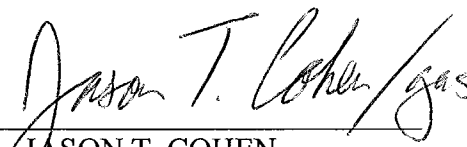
12. Annexed as Exhibit 11 is a true and correct copy of an e-mail from Douglas Bloomfield to Peter Zalmayev, dated March 21, 2011, Bates stamped BA 00108.

13. Annexed as Exhibit 12 is a true and correct copy of a legal memorandum prepared by the Eurasia Democracy Initiative.

14. Annexed as Exhibit 13 is a true and correct copy of Defendant's Letter to Magistrate Judge Gorenstein, dated October 17, 2011, without its accompanying exhibits.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York, New York on November 22, 2011.



JASON T. COHEN